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COMMISSION
CLERK

April 2, 2020

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 20200001-EI

REDACTED

Dear Mr. Teitzman:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding certain portions of Gulf Power's August-December, 2019 Hedging Activity Report.

Sincerely,

Richard Hume
Regulatory Issues Manager

md

Enclosures

cc: Gulf Power Company
Russell Badders, Esq., VP & Associate General Counsel

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost
recovery clause and generating performance
incentive factor

Docket No.: 20200001-EI
Date filed: April 3, 2020

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY [“Gulf Power”, “Gulf”, or the “Company”], by and through its undersigned attorney and pursuant to Rule 25-22.006, Florida Administrative Code, hereby files a request that the Florida Public Service Commission enter an order protecting from public disclosure certain portions of Gulf Power’s Hedging Activity Report. As grounds for this request, the Company states:

1. Pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2020-0041-PCO-EI, Gulf Power is required to file a Hedging Activity Report by April 3, 2020 detailing its hedging transactions during the months of August through December of the previous year.

2. A portion of the information in the Hedging Activity Report constitutes proprietary and commercially sensitive information regarding competitive interests and contractual matters of Gulf Power which, if disclosed to the general public, would cause irreparable harm to Gulf Power and its customers. This information is entitled to confidential classification pursuant to section 366.093(3)(d), Florida Statutes. Specifically, the information consists of pricing terms for natural gas hedging transactions between Gulf Power and various counterparties. Gulf, its counterparties and other members of the market in which it competes consider this type of information to be competitively sensitive. Disclosure of this information would adversely affect Gulf’s ability to contract for goods and services on favorable terms for the benefit of its customers, would impair the competitive interests of Gulf and its vendors, and would place Gulf at a competitive disadvantage when coupled with other information that is publicly available.

3. The information filed pursuant to this Request is intended to be, and is treated as, confidential by Gulf Power and, to this attorney's knowledge, has not been otherwise publicly disclosed.

4. Submitted as Exhibit "A" is a copy of Gulf Power's Hedging Activity Report, on which is highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of Gulf's Hedging Activity Report which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line/field-by-field justification for the request for confidential classification.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 2nd day of April, 2020.



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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost
recovery clause and generating performance
incentive factor

Docket No.: 20200001-EI
Date: April 3, 2020

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk under separate cover as confidential
information.

EXHIBIT "B"

	A	B	C	D	E	F	G	H	I	J	K
	Deal Category	Counterparty	Deal Type	Deal Number	Description	Fixed Price	Receive Price	Price	Volume (Signed)	Period-End Gain/Loss (Signed)	Contract Month
1	Financial Gas	Citigroup Energy Inc.	Swap	2462168					30,000		201908
2	Financial Gas	JPMorgan Chase Bank	Swap	2462021					40,000		201908
3	Financial Gas	JPMorgan Chase Bank	Swap	2462023					60,000		201908
4	Financial Gas	JPMorgan Chase Bank	Swap	2462024					40,000		201908
5	Financial Gas	JPMorgan Chase Bank	Swap	2462025					40,000		201908
6	Financial Gas	JPMorgan Chase Bank	Swap	2462041					40,000		201908
7	Financial Gas	JPMorgan Chase Bank	Swap	2462094					30,000		201908
8	Financial Gas	JPMorgan Chase Bank	Swap	2462128					40,000		201908
9	Financial Gas	Merrill Lynch Commodities	Swap	2461994					60,000		201908
10	Financial Gas	Merrill Lynch Commodities	Swap	2461996					30,000		201908
11	Financial Gas	Merrill Lynch Commodities	Swap	2462000					40,000		201908
12									TOTAL 450,000	(818,240.00)	

	A	B	C	D	E	F	G	H	I	J	K
	Deal Category	Counterparty	Deal Type	Deal Number	Description	Fixed Price	Receive Price	Price	Volume (Signed)	Period-End Gain/Loss (Signed)	Contract Month
1	Financial Gas	Citigroup Energy Inc.	Swap	2462168					30,000		201909
2	Financial Gas	JPMorgan Chase Bank	Swap	2462021					40,000		201909
3	Financial Gas	JPMorgan Chase Bank	Swap	2462023					60,000		201909
4	Financial Gas	JPMorgan Chase Bank	Swap	2462024					40,000		201909
5	Financial Gas	JPMorgan Chase Bank	Swap	2462025					40,000		201909
6	Financial Gas	JPMorgan Chase Bank	Swap	2462041					40,000		201909
7	Financial Gas	JPMorgan Chase Bank	Swap	2462094					30,000		201909
8	Financial Gas	JPMorgan Chase Bank	Swap	2462128					40,000		201909
9	Financial Gas	Merrill Lynch Commodities	Swap	2461994					60,000		201909
10	Financial Gas	Merrill Lynch Commodities	Swap	2461996					30,000		201909
11	Financial Gas	Merrill Lynch Commodities	Swap	2462000					40,000		201909
12	TOTAL								450,000	(768,740.00)	

	A	B	C	D	E	F	G	H	I	J	K
	Deal Category	Counterparty	Deal Type	Deal Number	Description	Fixed Price	Receive Price	Price	Volume (Signed)	Period-End Gain/Loss (Signed)	Contract Month
1	Financial Gas	Citigroup Energy Inc.	Swap	2462168					30,000		201910
2	Financial Gas	JPMorgan Chase Bank	Swap	2462021					40,000		201910
3	Financial Gas	JPMorgan Chase Bank	Swap	2462023					60,000		201910
4	Financial Gas	JPMorgan Chase Bank	Swap	2462024					40,000		201910
5	Financial Gas	JPMorgan Chase Bank	Swap	2462025					40,000		201910
6	Financial Gas	JPMorgan Chase Bank	Swap	2462041					40,000		201910
7	Financial Gas	JPMorgan Chase Bank	Swap	2462094					30,000		201910
8	Financial Gas	JPMorgan Chase Bank	Swap	2462128					40,000		201910
9	Financial Gas	Merrill Lynch Commodities	Swap	2461994					60,000		201910
10	Financial Gas	Merrill Lynch Commodities	Swap	2461996					30,000		201910
11	Financial Gas	Merrill Lynch Commodities	Swap	2462000					40,000		201910
12									TOTAL 450,000	(689,090.00)	

	A	B	C	D	E	F	G	H	I	J	K
	Deal Category	Counterparty	Deal Type	Deal Number	Description	Fixed Price	Receive Price	Price	Volume (Signed)	Period-End Gain/Loss (Signed)	Contract Month
1	Financial Gas	Citigroup Energy Inc.	Swap	2462168					30,000		201911
2	Financial Gas	JPMorgan Chase Bank	Swap	2462024					40,000		201911
3	Financial Gas	JPMorgan Chase Bank	Swap	2462025					40,000		201911
4	Financial Gas	JPMorgan Chase Bank	Swap	2462041					40,000		201911
5	Financial Gas	JPMorgan Chase Bank	Swap	2462094					30,000		201911
6	Financial Gas	JPMorgan Chase Bank	Swap	2462108					40,000		201911
7	Financial Gas	JPMorgan Chase Bank	Swap	2462128					40,000		201911
8	Financial Gas	JPMorgan Chase Bank	Swap	2462131					40,000		201911
9	Financial Gas	JPMorgan Chase Bank	Swap	2462137					30,000		201911
10	Financial Gas	JPMorgan Chase Bank	Swap	2462160					20,000		201911
11	Financial Gas	Merrill Lynch Commodities	Swap	2461996					30,000		201911
12	Financial Gas	Merrill Lynch Commodities	Swap	2462000					40,000		201911
13	Financial Gas	Merrill Lynch Commodities	Swap	2462012					50,000		201911
14	Financial Gas	Merrill Lynch Commodities	Swap	2462018					30,000		201911
15	Financial Gas	Merrill Lynch Commodities	Swap	2462019					30,000		201911
16									TOTAL	530,000	(602,680.00)

	A	B	C	D	E	F	G	H	I	J	K
	Deal Category	Counterparty	Deal Type	Deal Number	Description	Fixed Price	Receive Price	Price	Volume (Signed)	Period-End Gain/Loss (Signed)	Contract Month
1	Financial Gas	Citigroup Energy Inc.	Swap	2462168					30,000		201912
2	Financial Gas	JPMorgan Chase Bank	Swap	2462024					40,000		201912
3	Financial Gas	JPMorgan Chase Bank	Swap	2462025					40,000		201912
4	Financial Gas	JPMorgan Chase Bank	Swap	2462041					40,000		201912
5	Financial Gas	JPMorgan Chase Bank	Swap	2462094					30,000		201912
6	Financial Gas	JPMorgan Chase Bank	Swap	2462108					40,000		201912
7	Financial Gas	JPMorgan Chase Bank	Swap	2462128					40,000		201912
8	Financial Gas	JPMorgan Chase Bank	Swap	2462131					40,000		201912
9	Financial Gas	JPMorgan Chase Bank	Swap	2462137					30,000		201912
10	Financial Gas	JPMorgan Chase Bank	Swap	2462160					20,000		201912
11	Financial Gas	Merrill Lynch Commodities	Swap	2461996					30,000		201912
12	Financial Gas	Merrill Lynch Commodities	Swap	2462000					40,000		201912
13	Financial Gas	Merrill Lynch Commodities	Swap	2462012					50,000		201912
14	Financial Gas	Merrill Lynch Commodities	Swap	2462018					30,000		201912
15	Financial Gas	Merrill Lynch Commodities	Swap	2462019					30,000		201912
16									TOTAL	530,000	(669,990.00)

EXHIBIT "C"

Line-by-Line/Field-by-Field Justification

<u>Line(s)/Field(s)</u>	<u>Justification</u>
Page 2 of 6 Lines 1-11, Columns E, F, G, H and J	This information is entitled to confidential classification pursuant to §366.093(3)(d), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.
Page 3 of 6 Lines 1-11, Columns E, F, G, H and J	
Page 4 of 6 Lines 1-11, Columns E, F, G, H and J	
Page 5 of 6 Lines 1-15, Columns E, F, G, H and J	
Page 6 of 6 Lines 1-15, Columns E, F, G, H and J	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost**)
Recovery Clause with Generating)
Performance Incentive Factor)

Docket No.: **20200001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 2nd day of April, 2020 to the following:

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